

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

GORDON CAPLAN,

Defendant.

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) Criminal No. 1:19-cr-10117-IT
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GORDON CAPLAN'S ASSENTED-TO MOTION FOR RETURN OF PASSPORT

Gordon Caplan respectfully moves for the return of his United States passport, which is in custody of the United States Probation/Pretrial Services Office in the Southern District of New York. Counsel for the government has informed undersigned counsel that it assents to this Motion. In support of this Motion, Mr. Caplan states as follows:

1. Mr. Caplan was arrested on March 12, 2019 in the Southern District of New York, and on April 3, 2019 he made his initial appearance in this Court.

2. As part of his release conditions, the Court ordered that Mr. Caplan surrender any passports to the United States Probation/Pretrial Services Office. Mr. Caplan had surrendered his passport at the time of his arrest in the Southern District of New York.

3. Mr. Caplan subsequently pleaded guilty to a one count Information alleging violation of 18 U.S.C. § 1349, and on October 3, 2019 the Court sentenced Mr. Caplan to one month of imprisonment, followed by one year of supervised release.

4. Mr. Caplan thereafter reported to the facility to which he was designated by the Bureau of Prisons, and he completed his prison term on November 22, 2019.

5. The United States Probation/Pretrial Services Office in the Southern District of New York remains in possession of Mr. Caplan's passport.

Accordingly, Mr. Caplan respectfully requests that the Court direct the United States Probation/Pretrial Services Office to return his United States passport to him or to undersigned counsel.

Dated: December 2, 2019

Respectfully submitted,

By: /s/ Joshua S. Levy

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Attorneys for Defendant Gordon Caplan

CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2019, I filed the foregoing with the United States District Court for the District of Massachusetts using the CM/ECF system, and caused it to be served on all registered participants via the notice of electronic filing (the “NEF”).

Dated: December 2, 2019

/s/ Joshua S. Levy
Joshua S. Levy